



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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September 20, 2006

VIA EMAIL AND USPS

Thomas P. O'Neill, Senior Counsel  
KeySpan Energy Delivery  
52 Second Avenue  
Waltham MA 02451

Cheryl M. Kimball, Esq.  
Keegan Werlin LLP  
265 Franklin Street  
Boston MA 02110-3313

RE: Petition of KeySpan Energy Delivery New England for approval of a Firm  
Transportation Agreement with Algonquin Gas Transmission, LLC,  
D.T.E. 06-54

Dear Attorneys O'Neill and Kimball:

Enclosed please find the first set of information requests issued by the Department of Telecommunications and Energy ("Department") to KeySpan Energy Delivery New England ("KeySpan") in the above-captioned matter. Please submit KeySpan's responses to the Department on or before 5:00 p.m., Wednesday, October 4, 2006. If you have any questions regarding the information requests, please contact me at 617-305-3561.

Sincerely,

/s/  
Carol Pieper  
Hearing Officer

Encs.

cc: D.T.E. 06-54 Service List (w/encs.)

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY  
TO KEYSpan ENERGY DELIVERY NEW ENGLAND, D.T.E. 06-54**

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Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to KeySpan Energy Delivery New England (“KeySpan”) the following Information Requests.

**Instructions**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if KeySpan or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:  
  
Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary L. Cottrell, Secretary of the Department; also submit two (2) copies of the responses to Carol Pieper, Hearing Officer, one (1) copy of the responses to Andreas Thanos, Assistant Director, Gas Division, and one (1) copy of the responses to Cynthia Bradbury, Analyst, Gas Division.
8. In addition to filings, all non-proprietary responses should be submitted by e-mail to [dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us) and to the e-mail address of any party required to be served.
9. Responses are due on or before October 4, 2006.

### **Requests**

- DTE 1-1 Please refer to page 5, line 12 of Ms. Arangio's testimony. Please explain in detail what is meant by Cape Cod's limited access to the interstate pipeline system.
- DTE 1-2 Please refer to page 8 of Ms. Arangio's testimony. Lines 16-17 refer to two firm transportation contracts "up to MDTQ of 38,000 MMBtu/day." Is the minimum daily transportation quantity a requirement?
- DTE 1-3 Please refer to page 15, line 16 of Ms. Arangio's testimony. Is the installation of the new distribution pipeline meant to guarantee service to existing customers or to supply service to new customers? Please explain.
- DTE 1-4 Please refer to page 10 of Mr. Poe's testimony. In the past several winters, how frequently has Algonquin found it necessary to impose hourly flow restrictions? Please provide a listing of such occurrences for the past 3 Peak Periods.
- DTE 1-5 How does the Company propose to recover the costs associated with the infrastructure improvements on the Cape Cod distribution system? How does the Company propose to assign these costs to customers?
- DTE 1-6 Refer to pages 8-9 of Ms. Arangio's testimony. Please provide KeySpan's present capacity rights of the G Lateral. Please provide KeySpan's projected capacity rights of the upgraded system.

Dated: September 20, 2006